

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

Horizon Global Americas Inc.

Case No. 2:17-cv-11879

Plaintiff,

Judge Avern Cohn

v.

Curt Manufacturing, LLC

Magistrate Stephanie Dawkins Davis

Defendant.

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**Horizon's designation of paradigm patent claims**

As required by the Court's Claim Construction Order (ECF #30), plaintiff Horizon Global Americas Inc. designates its paradigm patent claims. Horizon provides this designation solely to comply with the Court's Order, which requires Cequent to select five patents and two claims per patent as paradigm. As such, Horizon is still asserting, and not withdrawing, the other claims in the other Horizon patents identified in the pleadings, and Horizon reserves its right to proceed on those other claims and other patents at the appropriate time.

<b><i>Paradigm Patent</i></b>	<b><i>Paradigm Claims</i></b>
9,522,583	1, 4
9,592,863	1, 4
9,248,713	1, 4
8,179,142	1, 3 <sup>1</sup>
6,068,352	1, 64

Dated: August 31, 2018

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**Certificate of Service**

The undersigned certifies the above paper was served on counsel for defendant via the Court's ECF system on August 31, 2018.

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